## Caae e 3 1100 cox 4000 49811 - JUSAW | Domcument t 56 | Filed 00 44 22 44 1122 | Pragget 1 1 o f 2 2 1 ADRIENNE C. PUBLICOVER (SBN 161432) Email: Adrienne.Publicover@WilsonElser.com 2 DENNIS J. RHODES (168417) Email: Dennis.Rhodes@WilsonElser.com 3 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP 525 Market Street, 17<sup>th</sup> Floor 4 San Francisco, CA 94105-2725 5 Tel.: (415) 433-0990 Fax: (415) 434-1370 6 Attorneys for Defendants RELIANCE STANDARD LIFE INSURANCE COMPANY 7 and THE GENENTECH, INC., LONG TERM DISABILITY INSURANCE PLAN 8 9 SCOTT KALKIN (SBN 120791) ROBOOSTOFF & KALKIN 10 A Professional Law Corporation 369 Pine Street, Suite 610 11 San Francisco, CA 94104 (415) 732-0282 Tel: 12 Fax: (415) 732-0287 13 Attorneys for Plaintiff ISELA DIMERY 14 15 IN THE UNITED STATES DISTRICT COURT 16 FOR THE NORTHERN DISTRICT OF CALIFORNIA 17 18 ISELA DIMERY, Case No.: CV10-00481 JSW 19 Plaintiff, STIPULATION TO EXTEND TIME TO ADVISE COURT OF OUTCOME OF 20 **DISCUSSIONS PURSUANT TO ORDER** VS. 21 ON CROSS-MOTIONS FOR SUMMARY RELIANCE STANDARD LIFE JUDGMENT; AND [PROPOSED] ORDER 22 INSURANCE COMPANY AS ADMINISTRATOR AND FIDUCIARY OF [Local Rule 6-1] THE GENENTECH, INC., LONG TERM 23 DISABILITY INSURANCE PLAN AND 24 THE GENENTECH, INC., LONG TERM DISABILITY INSURANCE PLAN, 25 Defendants. 26 IT IS HEREBY STIPULATED, pursuant to Local Rule 6-1, by and between Plaintiff 27 Isela Dimery ("Plaintiff"), defendant Reliance Standard Life Insurance Company ("Reliance 28 STIPULATION TO EXTEND TIME ADVISE COURT OF OUTCOME OF DISCUSSIONS PURSUANT TO ORDER ON CROSS-MOTIONS FOR SUMMARY JUDGMENT; AND [PROPOSED] ORDER USDC NDCA Case # CV10-00481 JSW

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## Standard"), and defendant The Genentech, Inc. Long Term Disability Insurance Plan ("the Plan") 1 (collectively Reliance Standard and the Plan referred to as "Defendants"), through their attorneys 2 of record, as follows: 3 1. Pursuant to this Court's order dated March 28, 2012, the Parties are required to 4 report by to the Court by April 30, 2012 as to whether they have reached agreement on the amount 5 of the offset awarded to Reliance Standard. The Parties are still discussing the issue and need 6 additional time to complete their discussions. 7 2. In view of ongoing discussions, the parties agree that an extension of time from 8 April 30, 2012 to May 21, 2012 should allow them to complete their meet and confer sessions. 9 3. This extension will not alter the date of any event or any deadline already fixed by 10 Court order. 11 Based on the foregoing, the Parties respectfully request that the date for reporting to the 12 court be extended from April 30, 2012 to May 21, 2012. 13 14 Dated: April 23, 2012 WILSON, ELSER, MOSKOWITZ, 15 **EDELMAN & DICKER LLP** 16 /s/ Dennis J. Rhodes Adrienne Publicover 17 Dennis J. Rhodes Attorneys for Defendants RELIANCE STANDARD LIFE INSURANCE 18 COMPANY and THE GENENTECH, INC., LONG 19 TERM DISABILITY INSURANCE PLAN 20 Dated: April 23, 2010 ROBOOSTOFF & KALKIN 21 /s/ Scott Kalkin By:\_ Scott Kalkin 22 Attorneys for Plaintiff ISELA DIMERY 23 **ORDER** 24 IT IS SO ORDERED. 25 April 24, 2012 By: 26 27

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